



Nuclear Innovation
North America LLC
122 West Way, Suite 405
Lake Jackson, Texas 77566
979-316-3000

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U7-C-NINA-NRC-140027
10 CFR Part 21

U. S. Nuclear Regulatory Commission
Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Nuclear Innovation North America Response to General Electric-Hitachi
Final 10CFR Part 21 Report

On August 29, 2014, General Electric-Hitachi (GEH) Nuclear Energy submitted a final 10CFR Part 21 report summarizing an investigation into a non-conservative assumption in the hydrodynamic load definition for the Advanced Boiling Water Reactor (ABWR). GEH had previously submitted interim reports on this subject on March 31, 2014, and June 26, 2014. The GEH final evaluation concluded that the predicted increase in the suppression pool water level above the value used for defining the ABWR loads and applied in structural analysis will not result in a Substantial Safety Hazard or lead to exceeding a Technical Specification Safety Limit for the US ABWR Certified Design.

Nuclear Innovation North America (NINA) and Toshiba Corporation have completed a separate evaluation of this issue. A change to the assumption of TS high suppression pool level to a higher level as an input to the load calculation has an insignificant (less than 1%) impact on the containment structure. The other structures that could be affected, most notably the access tunnel, have not been designed yet. However, analyses considering the Japanese ABWR access tunnels indicate that the increases in combined loads are relatively small, and sufficient margin exists to accommodate these increases.

NINA concludes that evaluation of this non-conservative assumption results in an insignificant change for the STP 3&4 design and, as such, does not require a change to the STP 3&4 application. Additionally NINA agrees with the GEH conclusion that this issue does not result in a Substantial Safety Hazard for the US ABWR design as defined under 10 CFR Part 21.

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The Toshiba report on this evaluation is available for review by the NRC Staff at their convenience in the Westinghouse Rockville office.

There are no commitments in this letter.

Should you have any questions regarding this matter, please contact Bill Mookhoek at 979-316-3014 or myself at 979-316-3011.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9/15/14



Scott Head
Manager, Regulatory Affairs
NINA STP Units 3 & 4

wem

cc: w/o attachment except*
(paper copy)

(electronic copy)

Director, Office of New Reactors
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

*Tom Tai
Fred Brown
U. S. Nuclear Regulatory Commission

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
1600 E. Lamar Blvd.
Arlington, Texas 76011-4511

Jamey Seely
Nuclear Innovation North America

Peter G. Nemeth
Crain, Caton & James, P.C.

Kathy C. Perkins, RN, MBA
Assistant Commissioner
Division for Regulatory Services
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

Richard Peña
Kevin Pollo
L. D. Blaylock
CPS Energy

Robert Free
Radiation Inspections Branch Manager
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

*Steven P. Frantz, Esquire
A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave. NW
Washington D.C. 20004

*Tom Tai
One White Flint North
11555 Rockville Pike
Rockville, MD 20852